

1 MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
2 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
3 ERIC A. TATE (CA SBN 178719)
ETate@mofo.com
4 RUDY Y. KIM (CA SBN 199426)
RKim@mofo.com
5 MORRISON & FOERSTER LLP
425 Market Street
6 San Francisco, California 94105-2482
Telephone: 415.268.7000
7 Facsimile: 415.268.7522

8 Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
9 OTTOMOTTO LLC, and OTTO TRUCKING LLC

10 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflp.com
11 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflp.com
12 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
13 Washington DC 20005
Telephone: 202.237.2727
14 Facsimile: 202.237.6131

15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR MOTION
FOR SUMMARY JUDGMENT OF
NON-INFRINGEMENT AND
SUPPORTING DECLARATION**

Trial Date: October 2, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to File Under Seal Portions of Their Motion for
6 Summary Judgment of Non-Infringement ("Motion") and Supporting Declaration.

7 2. The highlighted portions of the Defendants' Motion and the Declaration of James
8 Haslim ("Haslim Declaration") are CAD drawings of Uber's proprietary and highly confidential
9 design for Uber's custom LiDAR system. These portions are highlighted in blue. The design of
10 Uber's custom LiDAR system is proprietary and highly confidential and, if made public, would
11 cause Uber irreparable harm in this very competitive space of autonomous driving.

12 3. Uber's request to seal is narrowly tailored to those portions of the Motion and its
13 supporting papers that merit sealing.

14
15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct. Executed this 2nd day of May, 2017, in Palo Alto, California.

17
18 /s/ Michelle Yang

Michelle Yang

19
20 **ATTESTATION OF E-FILED SIGNATURE**

21 I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this
22 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
23 concurred in this filing.

24 Dated: May 2, 2017

/s/ Michael A. Jacobs

MICHAEL A. JACOBS